

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

SOUNDCLEAR TECHNOLOGIES LLC, Plaintiff, v. GOOGLE LLC, Defendant.	Case No. 2:24-cv-00321-AWA-DEM JURY TRIAL DEMANDED PUBLIC VERSION
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**DECLARATION OF [REDACTED] (“DECLARATION ONE”)
IN SUPPORT OF GOOGLE’S MOTION TO TRANSFER TO THE
NORTHERN DISTRICT OF CALIFORNIA UNDER 28 U.S.C. § 1404(a)**

I, [REDACTED], declare as follows:

1. I submit this declaration in support of Google LLC's Motion to Transfer Venue to the Northern District of California under 28 U.S.C. § 1404(a). I am over 18 years of age. Unless otherwise indicated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.
2. I am an employee at Google LLC ("Google"). I joined Google in 2016 and began working on [REDACTED]. After a few years on [REDACTED], I moved over to YouTube, where I spent approximately two and a half years. In February of 2023, I assumed the role as Product Lead for [REDACTED] including for Google Assistant. I am currently still the Product Lead for [REDACTED] I am based in Google's Mountain View, California headquarters.
3. Google has been headquartered in Northern California since its founding in 1998. It is currently headquartered in Mountain View, California. Google's Mountain View, California headquarters, which includes offices in neighboring Sunnyvale, California (collectively referred to as "Mountain View"), is the strategic center of Google's business.
4. I understand that Plaintiff SoundClear Technologies LLC ("Plaintiff") contends that Google infringes three U.S. Patents. I further understand that Plaintiff alleges that those three patents are infringed by Google Home, Google Nest Mini (1st Gen), Google Home Mini (1st Gen), Google Home Max, Google Nest Audio, Google Nest Hub, Google Nest Hub Max, and Google Nest Hub (2nd Gen), and Google Assistant (collectively, "Google Products").

5. As Product Lead for [REDACTED] I oversee and have overseen teams that work on the Google Products (the ones that are still in service). As part of my job, I also obtained historical knowledge about aspects of the people and teams that were involved in designing and developing the Google Products.
6. Based on my investigation, the following Google employees have relevant knowledge related to the design, development, and maintenance of the following features and functionalities of the Google Products:
 - a. [REDACTED] (myself). I currently work as Product Lead for [REDACTED] I am based in Google's headquarters in Mountain View. My team has responsibility for development and maintenance of Google's speech recognition technology, including identification of the speaker, and is knowledgeable about these features as used by Google Assistant. The majority of my team is based in Mountain View with some team members based in New York. No team members are based in Virginia. As Product Lead, I can speak to the development and operation of functionalities as used by Google Products such as speech recognition, endpointing, and Automatic Speech Recognition ("ASR") methods. I can speak to these topics on behalf of other members of my team whose knowledge on these topics would be roughly cumulative of my own.
 - b. [REDACTED]. From January 2021 until December 2023, [REDACTED] was the Senior Product Manager for [REDACTED]. [REDACTED] is based in Cambridge, Massachusetts. [REDACTED] can speak to the development and operation of functionalities as used by Google Products, such as speech recognition, including during the time frame that he was Senior Product Manager.

- c. [REDACTED]. Until the beginning of August 2023, [REDACTED] worked as a Senior Director of [REDACTED]. No one has yet been named as [REDACTED] replacement. [REDACTED] is based in Mountain View. Until August 2023, [REDACTED] led development of the technologies behind various Google Assistant features. [REDACTED] joined Google in 2009.
- d. [REDACTED]. [REDACTED] is currently a Staff Software Engineer on the [REDACTED]. Since joining Google in 2012, he has been based in Mountain View. [REDACTED] has responsibility for development and maintenance of the hotword feature (i.e., the “Ok Google” or “Hey Google” feature). The majority of [REDACTED] is based in Mountain View with one team member based in New York. No team members are based in Virginia. As a Staff Software Engineer, [REDACTED] can speak to the development and operation of functionalities as used by Google Products such as the hotword functionality and transmission of speech information. He can speak to these topics on behalf of other members of [REDACTED] whose knowledge on these topics would be roughly cumulative of his.
- e. [REDACTED]. [REDACTED] is the team lead for [REDACTED] [REDACTED] and has been in that role for approximately the last four years. He is based in Mountain View. [REDACTED] is knowledgeable about signal and audio processing for ASR and hotword on the Google Products. The majority of [REDACTED] is based in Mountain View with some team members based in Massachusetts. No team members are based in Virginia. As a team lead, [REDACTED] can speak to the

development and operation of functionalities as used by Google Products such as noise reduction and whether the Google Products perform beamforming related to ASR and hotword. He can speak to these topics on behalf of other members of [REDACTED] [REDACTED] whose knowledge on these topics would be roughly cumulative of his.

7. As Product Lead for [REDACTED] I also obtained historical knowledge about aspects of the people and teams that were involved in marketing related to the Google Products. My identification of teams and their members is as they exist in October 2024:
 - a. The team knowledgeable about marketing for the Google Products is based entirely in Mountain View and San Francisco. This team can speak to marketing for Nest and also Home, which was rebranded under Nest, because they have historical knowledge of the marketing for both products. This team can also speak to the marketing of Google Assistant.
 - b. I am aware of no team members knowledgeable about marketing for the Google Products that are based in Virginia.
8. As a matter of Google practice, documents and physical evidence in Google's possession pertaining to its products and services, including source code, are normally created and maintained by the employees working on those products and services. As discussed for the above features and functionalities of the Google Products, the employees with relevant knowledge to this litigation are located primarily in Mountain View. The relevant documents were primarily created and continue to be maintained in Mountain View and not Virginia.

9. Google maintains an office in Reston, Virginia as well as a data center in Loudoun County, Virginia which operates in relevant part identically to the other dozen Google data centers in the United States. However, I am not aware of Google employees with relevant knowledge of the above described features and functionalities of the Google Products, documents, or other evidence located in Virginia.

10. The following Google employees are based in Mountain View: [REDACTED]

[REDACTED]. The following Google employees are based in Colorado: [REDACTED]

[REDACTED]. The following Google employee is based in

Tokyo: [REDACTED]. The following Google employees are based in New York:

[REDACTED]

[REDACTED]. The following Google employee is based in Massachusetts: [REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 31 day, October 2024 in Mountain View, California.

[REDACTED]

Dated: November 4, 2024

Respectfully submitted,

/s/ Stephen E. Noona

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Counsel for Defendant Google LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2024, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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